

**ROGER P. CROTEAU & ASSOCIATES, LTD.**

• 9120 W. Post Road, Suite 100 • Las Vegas, Nevada 89148 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Plaintiff*  
**LAS VEGAS DEVELOPMENT GROUP, LLC**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\*\*\*

10 LAS VEGAS DEVELOPMENT GROUP, LLC, )  
11 a Nevada limited liability company, )  
12 )  
Plaintiff, )  
13 vs. )  
14 )  
SHIRLEY C. YFANTIS, an individual; )  
15 CRYSTALIA L. YFANTIS, an individual; )  
WELLS FARGO BANK, NA, a National )  
16 Banking Association; NATIONAL DEFAULT )  
SERVICING CORPORATION, an Arizona )  
17 corporation; MARIA BARROGA, an )  
individual; ANASTACIA CEPEDA, an )  
18 individual; SECRETARY OF THE )  
DEPARTMENT OF HOUSING AND URBAN )  
19 DEVELOPMENT, a federal governmental )  
agency; EVERGREEN MONEYSOURCE )  
20 MORTGAGE COMPANY, a Washington )  
corporation; DOE individuals I through XX; )  
21 and ROE CORPORATIONS I through XX, )  
Defendants. )  
22 )

Case No. 2:15-cv-1127-APG-CWH

**STIPULATION AND ORDER TO EXTEND TIME**  
**TO RESPOND TO HUD'S MOTION TO DISMISS**  
**(First Request)**

25 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC, and Defendant,  
26 SECRETARY OF THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
27 ("HUD"), by and through their undersigned counsel, and hereby stipulate and agree as follows:  
28

1. On October 19, 2015, HUD filed a Motion to Dismiss herein [Doc. #43].
2. Since the filing of said Motion, counsel for the parties have communicated with one another regarding an amicable resolution of said Motion.
3. In addition, Plaintiff's counsel has been required to devote time and attention to numerous other pending legal matters since the filing of the Motion to Dismiss which has detracted from the time available prepare a response.
4. The parties desire to attempt to resolve the Motion to Dismiss amicably before spending the time and resources necessary to brief the matter.
5. Plaintiff shall have an extension of time until December 9, 2015, in which to respond to HUD's Motion to Dismiss. HUD shall have until December 23, 2015, in which to file Reply.
6. This Stipulation is made in good faith and not for purpose of delay.

Dated this 3<sup>rd</sup> day of November, 2015.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

UNITED STATES ATTORNEY

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Plaintiff*  
**LAS VEGAS DEVELOPMENT GROUP,  
LLC**

/s/ Troy K. Flake  
TROY K. FLAKE, ESQ.  
Assistant U.S. Attorney  
333 Las Vegas Blvd So., Ste. 5000  
Las Vegas, NV 89101-  
702-388-6336  
702-388-6787 (fax)  
[troy.flake@usdoj.gov](mailto:troy.flake@usdoj.gov)  
*Attorney for Defendant*  
**SECRETARY OF THE DEPARTMENT  
OF HOUSING AND URBAN  
DEVELOPMENT**

**IT IS SO ORDERED.**

By:   
Judge, U.S. District Court

Dated: November 4, 2015

**ROGER P. CROTEAU & ASSOCIATES, LTD.**

• 9120 W. Post Road, Suite 100 • Las Vegas, Nevada 89148 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

**ROGER P. CROTEAU & ASSOCIATES, LTD.**

• 9120 W. Post Road, Suite 100 • Las Vegas, Nevada 89148 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of November, 2015, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION TO DISMISS** to the following parties:

Terry A. Moore  
Marquis & Aurbach  
10001 Park Run Drive  
Las Vegas, NV 89145  
702-382-0711  
[tmoore@marquisaurbach.com](mailto:tmoore@marquisaurbach.com)  
***Attorney for Defendants***  
***Evergreen Moneysource Mortgage***  
***Company, Crystalia L Y. Yfantis,***  
***and Shirley C. Yfantis***

Troy K. Flake  
United States Attorney  
333 Las Vegas Blvd So., Ste. 5000  
Las Vegas, NV 89101-  
702-388-6336  
702-388-6787 (fax)  
[troy.flake@usdoj.gov](mailto:troy.flake@usdoj.gov)  
***Attorney for Defendant***  
***Secretary of the Department of***  
***Housing and Urban Development***

Gregory L Wilde  
Tiffany & Bosco P.A.  
212 South Jones Blvd.  
Las Vegas, NV 89107  
(702) 258-8200  
(702) 258-8787 (fax)  
[efilenv@tblaw.com](mailto:efilenv@tblaw.com)  
***Attorney for Defendant***  
***National Default Servicing Corporation***

Justin A Shiroff  
Snell & Wilmer LLP  
3883 Howard Hughes Pkwy., Ste. 1000  
Las Vegas, NV 89169  
702-784-5200  
702-784-5252 (fax)  
[jshiroff@swlaw.com](mailto:jshiroff@swlaw.com)  
***Attorney for Defendant***  
***Wells Fargo Bank, N.A.***

/s/ Timothy E. Rhoda  
An employee of ROGER P. CROTEAU &  
ASSOCIATES, LTD.